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APCO

March 19, 2002

Missouri Department of Natural Resources  
Air Pollution Control Program  
Operating Permit Unit  
P. O. Box 176  
Jefferson City, MO 65102



Re: Annual / Semi-Annual Compliance Certification – Rush Island Plant –  
Operating Permit Number OP2000061

Dear Sir or Madam:

In accordance with the requirements of Rush Island Plant Operating Permit Number OP2000061, AmerenUE submits this annual / semi-annual report certifying compliance with the monitoring, record keeping and reporting requirements of the permit for the period July 1, 2001 through December 31, 2001.

This certification includes the following information:

- Identification of each federally enforceable term or condition of the permit that is the basis of the certification,
- Current compliance status,
- Whether compliance was continuous or intermittent,
- Method(s) used for determining compliance status,
- Whether the method was continuous or intermittent and
- Additional information required to determine compliance with permit conditions, i.e. references to Notice of Violations, Exceedance Reports, quarterly Opacity Excess Emission Reports, quarterly SO2 Excess Emission Reports.

#### **Plant Wide Emission Limitations**

**Permit Condition:** PW001 – Restriction of Particulate Matter to the Ambient Air beyond the Premises of Origin

**Compliance Status:** In Compliance - Periodic Monitoring was conducted in accordance with permit requirements

**Compliance (Continuous) or (Intermittent):** Intermittent

**Method used to show compliance:** Recordkeeping

**Method (Continuous) or (Intermittent):** Intermittent

**Permit Condition:** PW002 – SO3 Injection System Construction Permit  
**Compliance Status:** In Compliance – SO3 Injection System operated in a manner to promote maximum particulate efficiency of the electrostatic precipitators in accordance with procedures in construction permit 0992-017 dated September 17, 1992.

**Compliance (Continuous) or (Intermittent):** Continuous

**Method used to show compliance:** Recordkeeping

**Method (Continuous) or (Intermittent):** Continuous

**Permit Condition:** PW003 – Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating

**Compliance Status:** Reference the individual indirect heating sources subject to this rule

**Compliance (Continuous) or (Intermittent):** Intermittent

**Method used to show compliance:** Reference the individual indirect heating sources subject to this rule

**Method (Continuous) or (Intermittent):** Intermittent

**Permit Condition:** PW004 – Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

**Compliance Status:** In Compliance

**Compliance (Continuous) or (Intermittent):** Intermittent

**Method used to show compliance:** Recordkeeping

**Method (Continuous) or (Intermittent):** Intermittent

**Permit Condition:** PW005 – Emission Standards for Hazardous Air Pollutants

**Compliance Status:** In Compliance

**Compliance (Continuous) or (Intermittent):** Intermittent

**Method used to show compliance:** Recordkeeping

**Method (Continuous) or (Intermittent):** Intermittent

#### **Emission Unit Specific Emission Limitations**

**Permit Condition:** EU0010 and EU0020-01 Boiler 1&2 - Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating

**Compliance Status:** In Compliance – Recordkeeping was conducted in accordance with permit requirements. Weekly precipitator readings were overlooked on four individual occasions. We continue to improve our procedures in order to avoid this in the future.

**Compliance (Continuous) or (Intermittent):** Intermittent

**Method used to show compliance:** Data collection and recordkeeping.

**Method (Continuous) or (Intermittent):** Intermittent

**Permit Condition:** EU0010 and EU0020-02 Boiler 1&2 - Restriction of Emission of Visible Air Contaminants

**Compliance Status:** Details provided in the Continuous Emission Monitor Quarterly Report - Opacity

**Compliance (Continuous) or (Intermittent):** Intermittent

**Method used to show compliance:** Continuous Opacity Monitor

**Method (Continuous) or (Intermittent):** Continuous

**Permit Condition:** EU0010 and EU0020-03 Boiler 1&2 - Restriction of Emission of Sulfur Compounds

**Compliance Status:** In Compliance

**Compliance (Continuous) or (Intermittent):** Continuous

**Method used to show compliance:** Continuous Emission Monitors

**Method (Continuous) or (Intermittent):** Continuous

**Permit Condition:** EU0030-01 Auxiliary Boiler - Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating

**Compliance Status:** In Compliance

**Compliance (Continuous) or (Intermittent):** Intermittent

**Method used to show compliance:** Recordkeeping

**Method (Continuous) or (Intermittent):** Intermittent

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**Permit Condition:** EU0030-02 Auxiliary Boiler - Restriction of Emission of Visible Air Contaminants

**Compliance Status:** In Compliance – Annual USEPA Test Method 9 conducted in February and November 2001.

**Compliance (Continuous) or (Intermittent):** Intermittent

**Method used to show compliance:** Periodic Monitoring

**Method (Continuous) or (Intermittent):** Intermittent

**Permit Condition:** EU0030-03 Auxiliary Boiler - Restriction of Emission of Sulfur Compounds

**Compliance Status:** In Compliance

**Compliance (Continuous) or (Intermittent):** Intermittent

**Method used to show compliance:** Recordkeeping

**Method (Continuous) or (Intermittent):** Intermittent

**Permit Condition:** EU0060-01 Emergency Diesel Generator - Restriction of Emission of Sulfur Compounds

**Compliance Status:** In Compliance

**Compliance (Continuous) or (Intermittent):** Intermittent

**Method used to show compliance:** Recordkeeping

**Method (Continuous) or (Intermittent):** Intermittent

**Permit Condition:** EU0070-01 Silos for Coal Storage - Restriction of Emission of Visible Air Contaminants  
**Compliance Status:** In Compliance  
**Compliance (Continuous) or (Intermittent):** Intermittent  
**Method used to show compliance:** Recordkeeping  
**Method (Continuous) or (Intermittent):** Intermittent

**Permit Condition:** EU0080-01 Cold Solvent Cleaner – Control of Emissions from Solvent Metal Cleaning  
**Compliance Status:** In Compliance  
**Compliance (Continuous) or (Intermittent):** Intermittent  
**Method used to show compliance:** Recordkeeping  
**Method (Continuous) or (Intermittent):** Intermittent

### **Core Permit Requirements**

**Applicable Rule:** 10 CSR 10-6.050, Start-up, Shutdown and Malfunction Conditions  
**Compliance Status:** In Compliance  
**Compliance (Continuous) or (Intermittent):** Intermittent  
**Method used to show compliance:** None required.  
**Method is (Continuous) or (Intermittent):** Intermittent

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**Applicable Rule:** 10 CSR 10-6.060, Construction Permits Required  
**Compliance Status:** In Compliance  
**Compliance (Continuous) or (Intermittent):** Intermittent  
**Method used to show compliance:** Recordkeeping.  
**Method is (Continuous) or (Intermittent):** Intermittent

**Applicable Rule:** 10 CSR 10-6.065, Operating Permits  
**Compliance Status:** In Compliance – permit renewal was not required during this reporting period.  
**Compliance (Continuous) or (Intermittent):** Intermittent  
**Method used to show compliance:** Recordkeeping.  
**Method is (Continuous) or (Intermittent):** Intermittent

**Applicable Rule:** 10 CSR 10-6.110, Submission of Emission Data, Emission Fees and Process Information  
**Compliance Status:** In Compliance – Annual EIQ submitted prior to due date.  
**Compliance (Continuous) or (Intermittent):** Intermittent  
**Method used to show compliance:** Recordkeeping.  
**Method is (Continuous) or (Intermittent):** Intermittent

**Applicable Rule:** 10 CSR 10-6.130, Controlling Emissions During Episodes of High Air Pollution Potential

**Compliance Status:** In Compliance

**Compliance (Continuous) or (Intermittent):** Intermittent

**Method used to show compliance:** Recordkeeping.

**Method is (Continuous) or (Intermittent):** Intermittent

**Applicable Rule:** 10 CSR 10-6.150, Circumvention

**Compliance Status:** In Compliance – facility has not circumvented any rules set forth by the Missouri Conservation Commission that would increase emissions or air contaminants.

**Compliance (Continuous) or (Intermittent):** Intermittent

**Method used to show compliance:** None required.

**Method is (Continuous) or (Intermittent):** Intermittent

**Applicable Rule:** 10 CSR 10-6.180, Measurement of Emissions of Air Contaminants

**Compliance Status:** In Compliance – Director has not requested any source testing.

**Compliance (Continuous) or (Intermittent):** Intermittent

**Method used to show compliance:** None required.

**Method is (Continuous) or (Intermittent):** Intermittent

**Applicable Rule:** 10 CSR 10-5.070, Open Burning Restrictions

**Compliance Status:** In Compliance – no open burning took place during this reporting period.

**Compliance (Continuous) or (Intermittent):** Intermittent

**Method used to show compliance:** None required.

**Method is (Continuous) or (Intermittent):** Intermittent

**Applicable Rule:** 10 CSR 10-6.100 Alternate Emission Limits

**Compliance Status:** In Compliance

**Compliance (Continuous) or (Intermittent):** Intermittent

**Method used to show compliance:** None required.

**Method is (Continuous) or (Intermittent):** Intermittent

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the above statements and information are true, accurate, and complete.

If you have any questions, please contact Steve Hughes at (314) 554-3651.

Sincerely,

 3/27/02

A. P. Neuhalfen

Rush Island Plant Manager & Responsible Official

cc: USEPA Region 7 ✓  
Missouri Air Compliance Coordinator  
901 North Fifth Street  
Kansas City, KS 66101

Missouri Department of Natural Resources  
Air Pollution Control Program  
Enforcement Section Chief  
P.O. Box 176  
Jefferson City, MO 65102

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